

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS DAVID E. WILLIAMS  
(APWU/USPS-T1-8-17)  
(January 11, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-8 The APWU is concerned because the Postal Service has undertaken contemporaneously three significant initiatives that have the potential of affecting service on a nationwide basis. These are

- the change from six-day to five-day delivery that is the subject of N2010-1;
- the Retail Optimization Initiative that is the subject of N2011-1; and
- the Mail Processing Network Rationalization Plan that is the subject of this case, N2012-

We have a twofold concern: (1) that the potential or possible effect of these initiatives, in combination, may be more substantial and more negative for the Postal Service and for postal customers than can be understood or evaluated if each of the initiatives is considered separately and they are not considered together; and (2) that no Postal Service witness in any of these cases has discussed the possible combined effects of the three cases. With those concerns in mind, please answer the following questions:

- a) As Vice President of Network Operations, have you been given the official responsibility to consider or evaluate the possibility that the effects of the service changes caused by the Network Rationalization Plan on the Postal Service or its customers will in some way be exacerbated or increased either by the Retail Optimization Initiative or the change from six-day to five-day delivery, or by both?
- b) If your answer to 8.a. above is yes, please provide your analysis or evaluation of that possibility, and identify any report, memorandum or written summary of your findings, thoughts or conclusions, and state to whom you provided that information as a part of your official duties.
- c) If your answer to 8.a above is no, please identify any postal official or contractor who has been given that responsibility, identify any report, memorandum or other writing summarizing their findings, thoughts or conclusions, and state to whom that information was provided.

APWU/USPS-T1-9 As Vice President of Network Operations,

- a) Have you in your official capacity considered whether there is, or should be, any relationship between the fact that the Postal Service has proposed to reduce service to its customers in the three cases described in APWU/USPS-T1-8 above and, contemporaneously, has proposed both a general rate increase and an exigency increase?
- b) If your answer to 9.a. above is yes, please provide your analysis or evaluation of that relationship, and identify any report, memorandum or written summary of your findings, thoughts or conclusions, and state to whom you provided that information as a part of your official duties.

- c) If your answer to 9.a above is no, please identify any postal official or contractor who has been given that responsibility, identify any report, memorandum or other writing summarizing their findings, thoughts or conclusions, and state to whom that information was provided.

APWU/USPS-T1-10 In your position as V.P. of Network Operations, have you seen an evaluation of the combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2010-1, Six-Day to Five-Day Street Delivery and Related Changes? If so, please describe the analysis and summarize its results. If not, does that mean that the Postal Service has not made such an evaluation?

APWU/USPS-T1-11 Have you had the responsibility for evaluating any specific issues resulting from the proposal to institute the changes described in Docket No. N2010-1? If so, what aspects of that proposal have you evaluated?

APWU/USPS-T1-12 In analyzing and evaluating the changes proposed in this docket, did you consider or incorporate any of the proposed changes from Docket No. N2010-1 in your analysis? If so, please describe those and why they were important to this analysis.

APWU/USPS-T1-13 In your position as V.P. of Network Operations, have you seen an evaluation of the combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2011-1, Retail Optimization Initiative, 2011. If so, please describe the analysis and summarize its results. If not, does that mean that the Postal Service has not made such an evaluation?

APWU/USPS-T1-14 In your position as V.P. of Network Operations, have you seen an analysis of the potential combined revenue losses resulting from instituting all the proposed changes in N2010-1, N2011-1, and N2012-1? If so, please describe the analysis and summarize its results. If not, does that mean that the Postal Service has not made such an evaluation?

APWU/USPS-T1-15 Who at the Postal Service would have the responsibility for analyzing and evaluating the combined impacts on service, cost and revenues of implementing all the changes proposed in N2010-1, N2011-1 and 2012-1 together?

APWU/USPS-T1-16 Other than the Postmaster General, who at the Postal Service would have the responsibility for determining the appropriateness of proposing a 5.6 percent exigency rate increase at the same time that service cuts are being carried out as described with reference to the three cases cited above?

APWU/USPS-T1-17 Other than the Postmaster General, who at the Postal Service would have the responsibility for determining the appropriateness of proposing an exigency rate increase in an amount greater than 5.6 percent as an alternative to proposing the service cuts that are being carried out as described with reference to the three cases cited above?